



ADA Accommodations

CPS Human Resource Services provides reasonable accommodations for individuals who have one or more documented disabilities within the meaning of the Americans with Disabilities Act (ADA) of 1990. If you have a documented disability covered under the ADA and require test accommodations, you must notify CPS Human Resource Services in writing each time you apply to take a CPS Human Resource Services exam. The guidelines in the following sections will help ensure that you complete your request form correctly:

- ❖ General Guidelines for Accommodations
- ❖ Guidelines for Accommodations Based on Learning Disabilities
- ❖ Guidelines for Accommodations Based on Attention-Deficit/Hyperactivity Disorder

A. General Guidelines for Accommodations

CPS Human Resource Services will provide accommodations for candidates who provide appropriate and timely documentation from a qualified professional of their disability and its effect on their ability to take the exam under standard conditions. The following information should help you in completing your request for accommodations:

- Definition of Disability
- Accommodation Available
- Documentation Required

Definition of Disability

The ADA defines disability as a physical or mental impairment that substantially limits one or more major life activities, such as walking, seeing, hearing, or learning. Having a diagnosed impairment does not necessarily mean that an individual is disabled within the meaning of ADA, and not all disabilities require test accommodations.

Accommodations Available

Under the ADA, entities that administer standardized examinations must offer the examinations in a place and a manner that is accessible to persons with disabilities. This may require reasonable modifications to the manner in which the test is administered.

Available accommodations include but are not limited to the following:

- Reader
- Scribe
- Extended testing time
- Auxiliary aids and services, such as large print type
- Extra breaks

The goal of accommodations is to ensure that the results of an individual with documented disabilities “accurately reflect the individual’s aptitude or achievement level or whatever other factor the examination purports to measure, rather than reflecting the individuals impaired sensory, manual or speaking skills (except when those skills are the factors that the test purports to measure).” (ADA Regulations)



The goal of CPS Human Resource Services is to provide all qualified candidates access to the testing program. This includes disabled candidates who demonstrate functional limitations that affect their ability to take the exam.

Documentation Required

The purpose of documentation is to demonstrate that the individual is covered under the ADA and has a legitimate need for accommodations. It is important, therefore, that documentation provide a clear explanation of the impairment and rationale for special accommodations.

You must submit a request form and other documentation to CPS Human Resource Services in writing each time you apply to take a CPS Human Resource Services exam with accommodations. Be sure to submit the form that applies to your situation - either a first-time request or a subsequent request for accommodations.

If you are requesting accommodations from CPS Human Resource Services for the first time, you must complete the Questionnaire for Candidates Requesting Test Accommodations; a personal statement describing your disability and its impact on your daily life, your educational functioning, and your ability to take the CPS Human Resource Services exam under standard conditions; a Certification of Prior Test Accommodations form if appropriate; and documentation from qualified professionals to support your need for accommodations.

If you have received test accommodations for a CPS Human Resource Services exam within the last three years and would like to request accommodations again, you must complete the Form for Requesting Subsequent Test Accommodations and supply any necessary documentation to support your request for accommodations. You must submit this form to receive accommodations again, regardless of any previous accommodations you have received from CPS Human Resource Services.

All documentation submitted in support of a request for accommodation must meet the following criteria.

- State specific diagnosis of the disability. A professionally recognized diagnosis for the particular category of disability is required, for example, the Diagnostic and Statistical Manual of Mental Disorders-Fourth Edition (DSM-IV) diagnostic categories for learning disabilities.
- Be current. Because the provision of reasonable accommodations is based on how the candidate's disability currently affects the testing activity, it is in the individual's best interest to provide recent documentation. Since the manifestations of a disability may vary over time and in different settings, in most cases, an evaluation should have been conducted within the past three years.



- Describe the specific diagnostic criteria and name the diagnostic tests used, including the dates of evaluation, specific test results, and a detailed interpretation of the test results. This description should include relevant educational, developmental, and medical histories. Diagnostic tests used should be appropriate to the disability and current professional practices within the field. Informal or nonstandardized evaluations should be described in enough detail that other professionals can understand their role and significance in the diagnostic process.
- Describe in detail the limitations caused by the diagnosed disability, particularly the impact on functioning in regard to the exam process, and explain the relationship of the diagnostic test results to the identified limitations. The current impact on physical, perceptual, and cognitive abilities should be fully described; for example, a candidate with macular degeneration might be described as having reduced central vision, which limits the ability to read in some specified manner.
- Recommend specific accommodations and/or assistive devices, including a detailed explanation of why these accommodations or devices are needed and how they will reduce the impact of the identified functional limitation. Include specific accommodations that have been granted in the past and under what conditions. If no prior accommodations have been provided in school, in jobs, or by other testing organizations, the evaluator and/or the individual requesting accommodations should explain why no accommodations were given in the past and why accommodations are needed now.
- Establish the professional credentials of the evaluator that qualify him or her to make the particular diagnosis, including information about his or her license or certification and specialization in the area of diagnosis.

B. Guidelines for Accommodations Based on Learning Disabilities

The following information is provided to clarify the documentation process for candidates submitting a request for accommodations based on a learning disability or other cognitive impairment. Objective evidence of a substantial limitation in cognition or learning must be provided. At a minimum, the comprehensive evaluation should include the following:

- Diagnostic Interview
- Psycho-educational Evaluation

Diagnostic Interview

Because learning disabilities are commonly manifested during childhood, though not always formally diagnosed, relevant historical information regarding the individual's academic history and learning processes in elementary, secondary, and postsecondary education should be documented. The report should include a summary of a comprehensive diagnostic interview with relevant background information to support the



diagnosis. In addition to the candidate's self-report, the report should include the following as applicable:

- A description of the presenting problem(s)
- A developmental history
- Relevant academic history, including results of prior standardized testing; reports of classroom performance and behaviors, study habits, and attitudes; and, where available, transcripts from academic institutions
- Relevant psychosocial history
- Relevant medical history, including the absence of a medical basis for the present symptoms
- Relevant employment history
- A discussion of dual diagnosis, alternative or coexisting mood, behavioral, neurological, and/or personality disorders, along with any history of relevant medication and current use that may affect the individual's learning
- Exploration of possible alternatives that might mimic a learning disability when, in fact, one is not present

Psycho-educational Evaluation

The psycho-educational evaluation must be submitted on the letterhead of a qualified professional and must provide clear and specific evidence that a learning or cognitive disability does exist. The evaluation must consist of a comprehensive battery of appropriate tests, and the diagnosis must be based on the aggregate of test results, history, and level of current functioning. It is not acceptable to base a diagnosis on only one or two subtests. Tests must be appropriately normed for the age of the patient and must be administered in the designated standardized manner.

Minimally, the domains to be addressed in the psych-educational or neuropsychological evaluation should include the following:

- Cognitive functioning - A complete cognitive assessment with all subtests and standard scores reported is essential. Acceptable measures include but are not limited to the Wechsler Adult Intelligence Scale-III (WAID-III); Woodcock-Johnson Psycho-educational Battery-Revised: Test of Cognitive Ability; and the Kaufman Adolescent and Adult Intelligence Test.
- Achievement - A comprehensive achievement battery with all subtests and standard scores is essential. The battery must include current levels of academic functioning in relevant areas such as reading (decoding and comprehension) and mathematics. Acceptable instruments include but are not limited to the Woodcock-Johnson Psycho-educational Battery-Revised: Tests of Achievement; the Scholastic Abilities Test for Adults (SATA); and the Woodcock Reading Mastery Test-Revised. Specific achievement tests are useful instruments when administered under standardized conditions and when interpreted within the context of other diagnostic information. The Wide Range Achievement Test-3 (WRAT-3) and the Nelson-Denny Reading Test are not comprehensive diagnostic



- measures of achievement or reading speed or proficiency; therefore, neither is acceptable if used as the sole measure of achievement.
- Information processing - Specific areas of information processing (for example, short- and long-term memory, sequential memory, auditory and visual perception/processing, auditory and phonological awareness, processing speed, executive functioning, and motor ability) must be assessed. Acceptable measures include but are not limited to the Detroit Test of Learning Aptitude-Adult (DTLA-A), the Wechsler Memory Scale-III (WMS-III), and information from the Woodcock-Johnson Psycho-educational Battery-Revised: Test of Cognitive Ability.
 - Other assessment measures - Other formal assessment measures or nonstandard measures and informal assessment procedures or observations may be integrated with the above instruments to help support a differential diagnosis or to disentangle the learning disability from coexisting neurological and/or psychiatric issues. In addition to standardized test batteries, nonstandardized measures and informal assessment procedures may be helpful in determining performance across a variety of domains.

Actual tests must be provided (standard scores where available), and norms used to interpret the data need to be identified. It is helpful to list all test data in a score summary sheet appended to the evaluation.

A differential diagnosis must be reviewed, and various possible alternative causes for the identified problems in academic achievement should be ruled out. The evaluation should address key constructs underlying the concept of learning disabilities and provide clear and specific evidence of the information-processing deficit(s) and how these deficits currently impair the individual's ability to learn. No single test or subtest is a sufficient basis for diagnosis.

The differential diagnosis must demonstrate that the candidate has significant difficulties in acquiring and using listening, speaking, reading, writing, or reasoning skills and that the difficulties are not primarily caused by lack of exposure to the behaviors needed for academic learning or to an inadequate match between the individual's ability and the instructional demands.

A well-written clinical summary on a comprehensive evaluative process is a necessary component of the report. Assessment instruments and the data they provide do not diagnose, rather, they provide important data that should be integrated with background information, historical information, and current functioning. The following elements must be included in the clinical summary:

- Demonstration of the evaluator's having ruled out alternative explanations for the identified academic problems as a result of poor education, poor motivation and/or study skills, emotional problems, attention problems, and cultural or language differences.



- Indication of how patterns in cognitive ability, achievement, and information processing are used to determine the presence of a learning disability
- Indication of the substantial limitation to learning presented by the learning disability and the degree to which it affects the individual in the context of the exam
- Indication as to why specific accommodations are needed and how the effects of the specific disability are mediated by the recommended accommodation(s)

Problems such as test anxiety, English as a second language (in and of itself), slow reading without an identified underlying cognitive deficit, or failure to achieve desired academic outcome are not learning disabilities and therefore are not covered under the ADA.

The evaluator must describe the impact that the diagnosed learning disability has on a specific major life activity, as well as the degree of significance of this impact on the individual. The diagnostic report must include specific recommendations for accommodations and a detailed explanation as to why each accommodation is recommended. Recommendations should be tied to specific test results or clinical observations. The documentation should include any record of prior accommodations or auxiliary aids, including any information about specific conditions under which the accommodations were used and whether they were effective. However, a prior history of accommodation, particularly in a context other than taking a standardized test, without demonstration of a current need, does not in and of itself warrant the provision of a like accommodation. If no prior accommodations have been provided, the evaluator should include a detailed explanation as to why accommodations were not used in the past and why accommodations are needed at this time.

B. Guidelines for Accommodations Based on Attention-Deficit/Hyperactivity Disorder

Evaluations for accommodations based on Attention-Deficit/Hyperactivity Disorder (ADHD) must include the following:

- Assessment by a Qualified Evaluator
- Current Testing/Assessment
- Comprehensive Documentation
- Relevant Assessment Batteries
- Review of DSM-IV Criteria
- Specific Diagnosis
- Clinical Summary
- Rationale for Accommodations



Assessment by a Qualified Evaluator

As with other disabilities, the evaluation must be conducted by a qualified evaluator. Professionals conducting assessments and rendering diagnoses of ADHD must be qualified to do so. Comprehensive training in the differential diagnosis of ADHD and other psychiatric disorders and direct experience in diagnosing and treating adults is necessary. The evaluator's name, title, and professional credentials, including information about his or her license or certification as well as the area of specialization, employment, and state in which the individual practices should be clearly stated in the documentation.

Current Testing/Assessment

Testing/assessment must be current. The determination of whether an individual is significantly limited in functioning is based on how the impairment currently affects the individual's ability to take an exam (see Section A, General Guidelines for Accommodations).

Comprehensive Documentation

Documentation substantiating the ADHD must be comprehensive. Because ADHD is, by definition, exhibited in childhood (although it may not have been formally diagnosed) and in more than one setting, objective, relevant, historical information is essential. Information verifying a chronic course of ADHD symptoms from childhood through adolescence to adulthood - such as educational transcripts, report cards, teacher comments, tutoring evaluations, job assessments, and the like - are necessary.

- The evaluator is expected to review and discuss DSM-IV diagnostic criteria for ADHD and describe the extent to which the candidate meets these criteria. The report must include information about the specific symptoms exhibited and documented that the candidate meets criteria for long-standing history, impairment, and pervasiveness.
- A history of the individual's presenting symptoms must be provided, including evidence of ongoing impulsive/hyperactive or inattentive behaviors (as specified in DSM-IV) that significantly impair functioning in two or more settings.
- The information collected by the evaluator must consist of more than a self-report. Information from third-party sources is critical in the diagnosis of ADHD. Information gathered in the diagnostic interview and reported in the evaluation should include, but not necessarily be limited to, the following:
 - History of presenting attention symptoms, including evidence of ongoing impulsive/hyperactive or inattentive behavior that has significantly impaired functioning over time
 - Developmental history
 - Family history for presence of ADHD and other educational, learning, physical, or psychological difficulties deemed relevant by the evaluator



- Relevant medical and medication history including the absence of a medical basis for the symptoms being evaluated
- Relevant psychosocial history and any relevant interventions
- A thorough academic history of elementary, secondary, and postsecondary education
- A review of psycho-educational test reports to determine if a pattern of strengths or weaknesses is supportive of attention or learning problems
- Evidence of impairment in several life settings (such as home, school, work) and evidence that the disorder significantly restricts one or more major life activities
- Relevant employment history
- A description of current functional limitations relative to the CPS Human Resource Services exam in particular that are presumably a direct result of the described problems with attention
- A discussion of the differential diagnosis, including alternative or coexisting mood, behavioral, neurological, and/or personality disorders that may confound the diagnosis of ADHD
- An exploration of possible alternative diagnoses that might mimic ADHD

Review of DSM-IV Criteria

The diagnostic report must include a review of the DSM-IV criteria for ADHD both currently and retrospectively and specify which symptoms are present (see DSM-IV for specific criteria). According to DSM-IV, “the essential feature of ADHD is a persistent pattern of inattention and/or hyperactivity-impulsivity that is more frequent and severe than is typically observed in individuals at a comparable level of development.” Other criteria include the following:

- Symptoms of hyperactivity – impulsivity or inattention that cause impairments that were present in childhood
- Current symptoms that have been present for at least the past six months
- Impairment from the symptoms present in two or more settings (school, work, home)

Specific Diagnosis

The report must include a specific diagnosis of ADHD based on the DSM-IV diagnostic criteria. Individuals who report problems with organization, test anxiety, memory, and concentration only on a situational basis do not fit the prescribed diagnostic criteria for ADHD. The use of any medications, and their effectiveness, should be reported. A positive response to medication by itself is not supportive of a diagnosis, nor does the use of medication in and of itself support or negate the need for accommodation.



Clinical Summary

A well-written clinical summary based on a comprehensive evaluative process is a necessary component of the assessment. The clinical summary must be written by the qualified evaluator and must decide the following:

- Demonstration that the evaluator has ruled out alternative explanations for inattentiveness, impulsivity, and/or hyperactivity as a result of psychological or medical disorders or noncognitive factors
- Indication of how patterns of inattentiveness, impulsivity, and/or hyperactivity across the life span and across settings have been used to determine the presence of ADHD
- Indication of the substantial limitation presented by ADHD and the degree to which it affects the individual in the context for which accommodations are being requested
- Indication as to why specific accommodations are needed and how the effects of ADHD symptoms, as designated by the DSM-IV, are mediated by the accommodations

Rationale for Accommodations

The evaluator must describe the impact of ADHD (if one exists) on a specific major life activity, as well as the degree of significance of this impact on the individual. The diagnostic report must include a specific, detailed explanation as to why each accommodation is recommended and should be correlated with specific identified functional limitations. Documentation should address the need for accommodations based on the individual's current level of functioning. The documentation should include any record of prior accommodations or auxiliary aid, including information about specific conditions under which the accommodation was used (for example, standardized testing, final exams). However, a prior history of accommodation without demonstration of a current need does not in and of itself warrant the provision of similar accommodation. If no prior accommodation has been provided, the qualified professional and/or individual being evaluated should include a detailed explanation as to why no accommodation was needed in the past and why accommodation is needed at this time.

Because of the challenge of distinguishing ADHD from normal developmental patterns and behaviors of adults, including procrastination, disorganization, distractibility, restlessness, boredom, academic underachievement or failure, low self-esteem and chronic tardiness or inattendance, a multifaceted evaluation must address the intensity and frequency of the symptoms and whether these behaviors constitute an impairment in a major life activity.